



WARZYN

September 7, 1991

EPA Region 5 Records Ctr.



172071

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Mr. Wayne M. Hartwick, RPM
Mail Code 5HS-11
U.S. EPA, Region V
230 South Dearborn
Chicago, Illinois 60604

RE: Letter of Transmittal
Ecological Assessment
American Chemical Services NPL Site
Project # 60251

Dear Mr. Hartwick:

Warzyn Inc. has revised the Ecological Assessment for the ACS NPL Site. The changes which have been made to the Risk Assessment were based on the BTAG memo dated August 9, 1991, which was attached to the letter you sent to Warzyn on August 19, 1991. The BTAG letter contained 25 numbered comments.

As you requested, we are sending copies of the Ecological Assessment to you, Jim Burton at Roy F. Weston, and David Charters, as follows:

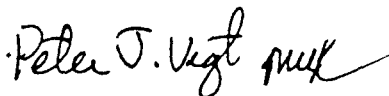
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|----------------|----------------|-----------------|
| Wayde Hartwick | 5 clean copies | 1 red-line copy |
| David Charters | 1 clean copy | |
| Jim Burton | 1 clean copy | 1 red-line copy |

We have responded to those comments as completely as possible, and included a red-line copy to you and Weston to facilitate your review. In addition, a table is attached to provide the details of our response to each of the 25 comments.

The re-drafted report is being submitted to you for delivery on October 8, 1991, as agreed in telephone conversations last week. Please call if I can be of further assistance or facilitate your review in any way.

Sincerely yours,

WARZYN INC.



Peter J. Vagt, Ph.D.
Project Coordinator

Enclosure

cc: PRP Technical Subcommittee
J. Burton, 2 copies
D. Charters, 1 copy

PV/vlr/DWH
[mad-110-42]
60251.23

THE PERFECT BALANCE
BETWEEN TECHNOLOGY
AND CREATIVITY

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**Response to U.S. EPA Comments
Dated August 9, 1991
on the Draft Ecological Assessment**

1. The approach Warzyn used is appropriate based on current guidance for Human Health Risk Evaluations, and in lieu of the lack of published guidance for ecological assessments.
2. The approach is considered appropriate; further clarifications of the applicability of the approach has been provided.
3. Approach is considered appropriate based on guidance from U.S. EPA (i.e., David Charters, at April 1991 meeting) in regard to updating the draft ecological assessment. Additional chemicals have not been added to the evaluation.

The approach used to screen for the toxic potential of a chemical has been explained in further detail. The uncertainty associated with using species-specific reference doses has been noted.

4. Approach is valid and clarification has been provided to justify its use.
5. Soil binding constants for metals could not be located for each chemical in the literature. Such values do exist, but are not defined as K_{oc}'s. BCFs and BAFs can not be applied for screening purposes, because of wide species to species and test procedure variability among studies. Therefore, changes were not made to the the report.
6. See response to Comment #3.
7. Revision has been provided for the information which was obtained from the Aquatic Information Retrieval (AQUIRE) database.
8. Further clarification has been to explain why PCBs are handled separately.
9. A reference has been added, and the footnote concept has been brought into the text as requested.
10. Warzyn's approach is valid. A clarification of the approach and further justification has been added.
11. Revisions have been provided based on the data which was obtained through the AQUIRE database. Revisions were not made for chemicals without for which data was not available from AQUIRE.
12. A qualitative discussion was included to point out which chemicals exceed AWQC. No further analysis will be performed beyond this (i.e., LOEL estimation from literature).

13. The original dilution factor was used to account for dilution with clean surface water and groundwater discharge, as well as, attenuation due to chemical binding to subsurface wetlands sediments. The factor has been retained and its use clarified.

The biodegradation factor was only used for nonpersistent chemicals (i.e., generally more water soluble).

14. Revision has been provided as requested for the chemicals for which appropriate information was obtained from the AQUIRE database.
15. Text has been updated to be consistent with RI Report.
16. Based on Warzyn's field investigation, the drainage ditch along the railroad corridor is ephemeral. Warzyn has been to the Site throughout the year.
17. Revision has been provided as requested.
18. Revision has been provided as requested.
19. The BAFs for organics and inorganics were default values based on professional judgment. Appropriate BAFs were not provided in the AQUIRE data base.
20. Revision has been provided as requested.
21. The potential for health effects to occur to mink populations been revised.
22. The text has been rewritten to address the fact that an AWQC exceedance means there is the potential for sensitive species to be affected.
23. Sediment Quality Criteria has been applied to continuously inundated sediments. Sediment Quality Criteria can be calculated for any chemical that may partition between sediment and water. This has been further explained in the text of the revised report.
24. The statement is considered accurate and is not necessarily in contradiction with the last sentence.
25. Revision has been provided as requested.